

## **EXHIBIT C**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

_____	)	
QUILL INK BOOKS LIMITED,	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	No. 1:19cv476-LO-MSN
	)	
RACHELLE SOTO a/k/a Addison Cain,	)	
<i>Defendant.</i>	)	
_____	)	

**NOTICE OF 30(b)(6) DEPOSITION**

PLEASE TAKE NOTICE that at 9:00 a.m. on June 9, 2019, at the offices of Craig C. Reilly, 111 Oronoco Street, Alexandria, Virginia 22314, you are hereby commanded to designate one or more officers, managing agents, or other persons competent to testify with respect to each of the subject matter categories identified in Exhibit A attached hereto.

The deposition shall be recorded by stenographic and audio-visual means before a notary public or other officer authorized by law to administer oaths and will continue from day to day until completed. The deposition will be taken for the purposes of discovery, for use at trial as evidence in this matter, or any other purposes permitted under the Federal Rules of Civil Procedure.

Issued this 22 day of May, 2020.

/s/ Tynia A. Watson

Craig C. Reilly VSB # 20942  
111 Oronoco Street  
Alexandria, Virginia 22314  
T: (703) 549-5354  
F: (703) 549-5355  
E: craig.reilly@ccreillylaw.com  
*Counsel for Defendant*

Shawn M. Dellegar, OBA # 20973  
Crowe & Dunlevy, P.C.  
321 South Boston Avenue, Suite 500  
Tulsa, Oklahoma 74103

T: (918) 592-9800

E: shawn.dellegar@crowedunlevy.com

*Counsel for Defendant (Pro Hac Vice)*

Tynia A. Watson, OBA # 30765

Crowe & Dunlevy, P.C.

324 N. Robinson Ave., Suite 100

Oklahoma City, Oklahoma 73102

T: (405) 235-7500

E: tynia.watson@crowedunlevy.com

*Counsel for Defendant (Pro Hac Vice)*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2020, a true and correct copy of the foregoing has been mailed and emailed to the following:

Quill Ink Books Limited  
c/o Zuri Thompson, director  
OFFICE 7  
35-37 Ludgate Hill  
London EC4M 7JN England  
[zoeytellis@gmail.com](mailto:zoeytellis@gmail.com)

/s/ Tynia A. Watson  
Crowe & Dunlevy, P.C.  
324 N. Robinson Ave., Suite 100  
Oklahoma City, Oklahoma 73102  
T: (405) 235-7500  
E: [tynia.watson@crowedunlevy.com](mailto:tynia.watson@crowedunlevy.com)

*Counsel for Defendant (Pro Hac Vice)*

## **EXHIBIT A**

### **MATTERS FOR EXAMINATION**

The person(s) designated must testify about information known or reasonably available to Defendant regarding the following matters:

1. The formation, organization, ownership, and operation of Quill Ink Books Limited (“Quill”).
2. The relationship of Zuri Thompson and Quill.
3. The factual allegations made in Quill’s First Amended Complaint.
4. The answers and defenses to the Counterclaims of Defendant Addison Cain (“Cain”).
5. The facts and circumstances related to the DMCA notices and counter-notices.
6. The facts and circumstances related to all online and social media posts by Quill or representatives of Quill related to this lawsuit, including but not limited to the Omegaverse Litigation Website, Zoey Ellis’ Facebook page, Zoey Ellis’ website, and the Fanlore Wikipedia site.
7. All facts and circumstances related to Zoey Ellis’ Myth of Omega series, including but not limited to drafts, origination, publication dates, quantities sold, profits, and costs.
8. All facts and circumstances related to Quill’s claim for damages.
9. The facts and circumstances related to Quill’s relationship with Margarita Coale and knowledge asserted by Quill in its answer to Cain’s Counterclaims.
10. The facts and circumstances related to Quill’s knowledge of Addison Cain’s Alpha’s Claim series prior to publication of Zoey Ellis’ Myth of Omega series.
11. Authentication of documents produced in the course of this litigation.